

DEMOCRACY FORWARD

March 21, 2025

The Honorable Lydia Kay Griggsby
District Judge
U.S. District Court for the District of Maryland
6500 Cherrywood Lane, Suite 400
Greenbelt, MD 20770

Re: Premotion notice in *Solutions in Hometown Connections, et al. v. Noem, et al.*, 25-cv-885

Dear Judge Griggsby:

We represent Plaintiffs in *Solutions in Hometown Connections, et al. v. Noem, et al.*, 25-cv-885. We write to provide notice of our intent to seek a temporary restraining order and preliminary injunction.

Plaintiffs are nonprofit organizations that participate in the Citizenship and Integration Grant Program run by Defendants. The CIGP was created to fund the work of nonprofit organizations “actively working to remove barriers to naturalization.” *Grant Program Impact*, U.S. Citizenship and Immigration Services, <https://perma.cc/9F4L-SVLG>. All Plaintiffs applied for and received CIGP grants. Using those funds, Plaintiffs provide English language lessons, legal assistance with the naturalization process, civics instruction, and other services required by the terms of the grants. Relying on the grant funds, Plaintiffs have hired staff, planned classes, subcontracted, and encouraged members of the community to avail themselves of Plaintiffs’ services.

In February, DHS Secretary Kristi Noem, implementing an executive order of President Trump, decided that all DHS grant funding that touched in any way on immigration would be frozen. The only support for that decision were broadly stated concerns that the funds were supporting illegal immigration, that they contained racially discriminatory language, or that they weren’t an efficient use of government funds. Within a week of Secretary Noem’s decision, Plaintiffs had their grant funds frozen indefinitely with no explanation.

As a result of Defendants’ grant freeze, Plaintiffs suffered immediate and irreparable harm. Some have had to lay off staff. Some have had to pare back programming. And all are losing the trust of vulnerable communities with whom they work—damaging relationships that often have taken years to build. Because of the immense harm, Plaintiffs seek to file a motion for a Temporary Restraining Order, Preliminary Injunction, and APA § 705 stay. Defendants’ actions are arbitrary and capricious, contrary to statutory and constitutional requirements, and ultra vires. And without immediate relief, Plaintiffs will continue to suffer irreparably.

Plaintiffs’ counsel and Defendants’ counsel have conferred and this matter cannot be resolved without a motion. Counsel have agreed to the following tentative briefing schedule:

- Plaintiffs’ opening brief: Tuesday, March 25
- Defendants’ response brief: Tuesday, April 1

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- Plaintiffs' reply brief: Friday, April 4

Additionally, if argument would assist the Court, counsel for both Plaintiffs and Defendants are available either Monday, April 7 or Tuesday, April 8.

Respectfully submitted,

/s/ Bradley Girard

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⁺*Application for full admission pending*

^{*}*Motion to appear pro hac vice forthcoming*